Verizon Massachusetts

Line Splitting Tariff Filing

October 2001

Service Description

Line Splitting provides one or more competitive local exchange carriers ("CLECs") with the ability to carry both voice and data services over the same unbundled analog copper loop, thereby allowing end user customers to obtain an integrated voice and data service. It consists of an xDSL based service provisioned by a data CLEC, ("DLEC"), utilizing the high frequency portion of the loop, and the voiceband service provisioned by the voice CLEC ("VLEC"). Under a Line Splitting arrangement, the VLEC utilizes the same unbundled network element ("UNE") ADSL-compatible loop as the DLEC and may also utilize Verizon's UNE switching and UNE transport.

As a condition of Verizon's Line Splitting service offering, the VLEC and DLEC must enter into a business arrangement to provide Line Splitting by submitting a Letter of Authorization to Verizon once the partnership is established and service is requested. The VLEC is recognized as the purchaser of the line and will be billed by Verizon as the "customer of record" for all loop-related charges, including loop and switching charges. Conversely, the DLEC is responsible for the splitter and for all splitter and collocation-related charges billed by Verizon.

The pre-ordering procedures for Line Splitting are consistent with those for Line Sharing. Prior to ordering a Line Splitting arrangement the loop must first be pre-qualified to determine if it is xDSL compatible. The VLEC or DLEC must utilize the loop qualification processes to make this determination.

Purpose of the Tariff Filing

In its *Line Sharing Order*,[1] the Federal Communications Commission ("FCC") directed the incumbent local exchange carriers ("ILECs") to enable the VLECs and DLECs to provide Line Splitting to their end user customers. While Verizon had never precluded the use of its UNEs from line splitting, Verizon developed procedures, under the Industry Collaborative established by the New York Public Service Commission ("NYPSC"), for the DLEC to place splitters in either the virtual or physical collocation arrangements and for the VLEC to purchase a loop and port to connect to the splitter to provide line splitting to the DLEC and/or VLEC end user customers. However, during these Industry

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[1] *See* Third Report and Order, *Deployment of Wireline Service Offering Advanced Telecommunications Capability*, FCC CC Dkt. No. 98-147, and Fourth Report and Order, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Dkt. No. 96-98, FCC 99-355, 14 FCC Rcd 20,912 (rel. Dec. 9, 1999) ("*Line Sharing Order*").

Collaborative sessions, the CLECs indicated the need for the ability, *inter alia*, to create a new line splitting arrangement utilizing UNE-P and, in some cases, migrate from line sharing to line splitting using one order.

Because there are a number of varied and complex procedures associated with implementing line splitting, as part of the Industry Collaborative sessions, the CLECs agreed to prioritize their requirements for the various options for line splitting implementation. Using those priorities, Verizon has developed Operating Support System ("OSS") changes that enable implementation of line splitting. Verizon developed the following scenarios in response to CLEC requests for line splitting arrangements. These same scenarios are reflected in Verizon's line splitting tariff in New York, which was approved on September 4, 2001,and are filed in Massachusetts in accordance with the Company's commitment to make the same service offerings available throughout its operating territory.

Scenario 1 – Add data to pre-existing UNE P.

Verizon will facilitate the ability of a DLEC to add data to an existing UNE-P arrangement. To obtain Line Splitting, the VLEC is required to have the UNE-P installed. The addition of the data will trigger the conversion of the UNE P arrangement to a two-wire line split loop and a UNE analog end office switch port. The VLEC or DLEC may submit a single Local Service Request using its own Alternate Exchange Carrier Name ("AECN") and must populate the LSP authorization field with the AECN of the partner for the Line Splitting arrangement.

Scenario 2 – Migration from Line Sharing to Line Splitting retaining the same DLEC.

Verizon will facilitate the migration of an existing Line Sharing arrangement to a Line Splitting arrangement while retaining the same data service on the line, *i.e.*, the voice service remains connected to the same splitter.

Scenario 3 – Disconnecting the data from a Line Splitting arrangement.
Verizon will facilitate the migration from Line Splitting back to a UNE-P when the data is disconnected from the Line Splitting arrangement. In this scenario, the loop and port are disconnected from the DLEC splitter and recombined to a UNE-P.

Explanation of Applicable Rates

Verizon MA's proposed Line Splitting rates for the additive data service are consistent with its approved Line Sharing rates. Service Order charges, CO wiring charges, manual intervention surcharges, service connection charges, installation dispatch in and out charges are the same for Line Sharing and Line Splitting. Splitter and collocation are billed to the DLEC. Line-related charges, such as collocation cross-connection and optional wideband testing charges, are billed to the VLEC. In addition, the VLEC is billed for all of the UNEs related to the voice service provided, such as the UNE ASDL

loop charge, UNE switch port charges, UNE switch usage charges, UNE transport charges, and any other related charges that would have applied to a UNE-P serving arrangement (*e.g.*, optional and ancillary features).

In this filing, Verizon MA introduces a new rate element to recover OSS development costs associated with Line Sharing, Line Splitting, and Line Splitting on Sub-Loop. This monthly recurring rate is applied on a per loop basis to accommodate two CLECs on the same line.

Summary of OSS Cost Study

Verizon MA has developed Massachusetts-specific costs relating to the OSS, which are included in this filing. That cost study is based on the new TELRIC methodology presented by Verizon MA in D.T.E. 01-20.